

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

January 19, 2000

Ms. Mary Bridgewater
March AFBCA/DD
3430 Bundy Ave., Bldg. 3408
March AFB, CA 92518-1504

Re: **Draft FOST for Subparcels D-8, D-9, F-1, J-4 through J-7, and Southeast Portion of D-5**

Dear Ms. Bridgewater:

This letter provides EPA comments on the subject FOST document. The draft SEBS and FOST contain substantial portions of the material submitted previously to EPA for review but do not reflect the comments EPA previously submitted by letter dated September 16, 1999. Those comments should be addressed along with the comments provided below.

General Comments:

Although EPA has repeatedly requested that the AF make efforts to identify the potential source of pesticide contamination to the affected groundwater monitoring wells, this task is yet to be accomplished. The parcels included within the draft FOST include several potential (soil) source locations, i.e., golf course storage buildings, golf course and housing units. EPA is prepared to support the transfer of these parcels only upon the commitment of the AF to complete the source investigations in a timely manner.

Specific Comments:

References to OT-22 in both documents should indicate that the ROD did not address groundwater contamination and therefore did not rule out this area as a potential source.

Please clarify references to Building 1055 (liquid oxygen storage). What materials stored in this facility are hazardous substances which should be included in the disclosure required by 120(h)(1) and (3)? Have all such materials been removed from the facility?

Section 5.2 of the FOST contains several sections/sentences which are nearly repetitive. Retain the earlier provisions and eliminate the later section. Section 5.2 also describes a number of restrictions which are not related to site conditions or anticipated remedial actions. Eliminate those provisions which are not required to protect human health and the environment or the remedial action.

Section 5.3, Petroleum Products and Derivatives. The second paragraph is inconsistent with the

first paragraph which asserts that there is no petroleum contamination present on this parcel. If the first paragraph is correct, the second should be eliminated.

Section 5.7, Lead-based Paint - Military Housing. The language contained in the draft fails to properly describe the age of the housing. Different rules apply to housing constructed pre 1960 and housing constructed between 1960 and 1978. The text should be revised to describe the housing and the manner in which the Air Force will comply with the recently promulgated rules under Section 1012/1013 of TSCA.

Section 5.8, Lead-based Paint - Facilities other than Housing. See previous EPA comments concerning this issue. Note that a restriction on the residential use of the property would address EPA's concern.

If you have any questions, please call me at (415) 744-2158.

Sincerely,

James Chang
Remedial Project Manager

cc:
Lahontan RWQCB/Mike Plaziak